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Attorneys for Defendant  
JEANNINE N. MOSSER, incorrectly  
named as JEANNINE J. MOSSER

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

~\*~

MICHAEL M. PARKER,  
  
Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of  
the State of Nevada; JOSEPH  
SAVLATORE, an individual; JEANNINE  
J. MOSSER, an individual; SHERIFF  
DOUGLAS C. GILLESPIE; DOES 1 - 20;  
and ROE CORPORATIONS 1 - 10,  
inclusive,

Defendants.

Case No. 2:11-CV-0443-PMP-RJJ

**STIPULATION AND ORDER TO EXTEND  
THE TIME FOR DEFENDANTS LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT,  
SHERIFF DOUGLAS GILLESPIE AND  
JEANNINE N. MOSSER, incorrectly  
named as JEANNINE J. MOSSER TO  
ANSWER OR OTHERWISE PLEAD TO  
PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

COMES NOW Plaintiff, MICHAEL M. PARKER, by and through his current attorneys  
of record, Bradley S. Mainor, Esq. and Joseph J. Wirth, Esq. of the law office of Mainor Eglet;  
Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT AND SHERIFF  
DOUGLAS GILLESPIE, by and through their attorney Tom Dillard, Jr., Esq. of the law office of  
Olson, Cannon, Gormley & Desruisseaux; and Defendant, JEANNINE N. MOSSER, incorrectly  
named as JEANNINE J. MOSSER, by and through her attorneys of record, Seetal Tejura, Esq. of  
the law office of Alverson, Taylor, Mortensen & Sanders, hereby stipulate and agree that an

1 extension of time is given to Defendants, LAS VEGAS METROPOLITAN POLICE  
2 DEPARTMENT, SHERIFF DOUGLAS GILLESPIE, and JEANNINE N. MOSSER,  
3 incorrectly named as JEANNINE J. MOSSER, to answer or otherwise plead to Plaintiff's  
4 Complaint on file herein until ten (10) days after the entry of a decision on Plaintiff's Counsel's  
5 Motion to Withdraw as counsel of record. The deadline for the Las Vegas Metropolitan Police  
6 Department and Sheriff Douglas Gillespie to file a response to the Complaint is arguably March  
7 27, 2011, while Jeannine Mosser's deadline is arguably March 29, 2011.

8 **A. PROCEDURAL HISTORY OF CASE AND BASIS FOR THIS**  
9 **STIPULATION**

10 On November 16, 2010, Plaintiff filed a Complaint in the Eighth Judicial District Court,  
11 Clark County, Nevada at Docket No. A-10-629472-C. On March 1, 2011, Plaintiff's Counsel  
12 filed its Motion to Withdraw as Counsel of Record for Plaintiff. On March 7, 2011, the Las  
13 Vegas Metropolitan Police Department and Sheriff Douglas Gillespie were served with the  
14 Summons, Complaint and Motion to Withdraw as Counsel of Record. On March 9, 2011,  
15 Defendant, Jeannine N. Mosser, incorrectly named as Jeannine J. Mosser, was personally served  
16 with a copy of the Summons, Complaint and Motion to Withdraw as Counsel of Record. On  
17 March 24, 2011, Defendants Las Vegas Metropolitan Police Department and Sheriff Gillespie  
18 filed a Notice of Removal of Civil Action to this Court. (Doc. No. 1). On March 25, 2011,  
19 Jeannine Mosser filed her Joinder to the Notice of Removal. (Doc. No. 4).

20 All counsel have agreed that that the deadline for the Las Vegas Metropolitan Police  
21 Department, Sheriff Douglas Gillespie, and Jeannine Mosser to answer or otherwise plead to the  
22 Complaint would be extended from their currently respective deadlines to ten (10) days after the  
23 entry of a decision of the Motion to Withdraw as Counsel (Doc. No. 1 at Exhibit C). The parties  
24 now seek to have the Court approve this extension. This extension is being submitted in good

faith and is not for the purpose of causing any undue delay.

DATED this 28<sup>th</sup> day of March, 2011

DATED this 28<sup>th</sup> day of March, 2011

MAINOR EGLET

ALVERSON, TAYLOR, MORTENSEN  
& SANDERS

By /s/ Joseph J. Wirth  
BRADLEY S. MAINOR, ESQ. (#007434)  
JOSEPH J. WIRTH, ESQ. (#010280)  
City Center Place  
400 South Fourth Street, 6<sup>th</sup> Floor  
Las Vegas, Nevada 89101  
Attorneys for Plaintiff

By /s/ Seetal Tejura  
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7401 W. Charleston Boulevard  
Las Vegas, Nevada 89117  
Attorneys for Defendant  
JEANNINE N. MOSSER, incorrectly  
named as JEANNINE J. MOSSER

DATED this 28<sup>th</sup> day of March, 2011

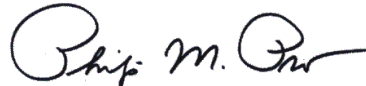
OLSON, CANNON, GORMLEY  
& DESRUISSEAU

By Thomas D. Dillard, Jr.  
THOMAS D. DILLARD, JR., ESQ. (#006271)  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
Attorneys for Defendant  
LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT

**ORDER**

This Stipulation is granted. The deadline for the LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT, SHERIFF DOUGLAS GILLESPIE, and JEANNINE N. MOSSER,  
incorrectly named as JEANNINE J. MOSSER, to answer or otherwise plead to the Complaint  
shall be no later than ten (10) days after the entry of a decision of the pending Motion to  
Withdraw as Counsel filed by Mainor Eglet.

Dated: This \_\_ 29th day of March, 2011.



PHILIP M. PRO, U.S. DISTRICT JUDGE

1 Respectfully submitted by:

2 ALVERSON, TAYLOR, MORTENSEN & SANDERS

3  
4 By /s/ Seetal Tejura  
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7401 W. Charleston Boulevard  
5 Las Vegas, Nevada 89117  
Attorneys for Defendant  
6 JEANNINE N. MOSSER, incorrectly  
named as JEANNINE J. MOSSER  
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